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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

INTUS CARE, INC.,

Plaintiff,

vs.

RTZ ASSOCIATES, INC.; and DOES 1
through 10,

Defendants,

Case No: 4:24-cv-01132-JST

Assigned to: Hon. Jon S. Tigar

**JOINT STIPULATION TO CONTINUE
TRIAL AND PRETRIAL DATES;
[PROPOSED] ORDER**

Complaint Filed: February 23, 2024
Amended Complaint Filed: April 2, 2024
Counterclaims Filed: June 20, 2024

1 Plaintiff IntusCare Inc. (“Intus” or “Plaintiff”) and Defendant RTZ Associates, Inc.
 2 (“RTZ” or “Defendant”), hereby jointly submit this Stipulation seeking a continuance of the
 3 January 12, 2026 trial date and a corresponding extension of the pretrial schedule.

4 Counsel for both sides have met and conferred and agreed to extend the current deadlines
 5 by approximately six months. The parties believe this extension will promote efficiency because
 6 it will:

- 7 1. Allow trial counsel adequate time to prepare for trial given the following conflicting
 8 trial dates of trial counsel:

- 9 a. Plaintiff’s trial counsel Andrew Beshai is engaged in the following trial:

- 10 i. October 13, 2025: *G.I. Industries dba Waste Management v.*
 11 *Arakelian Enterprises, Inc.* (Ventura County Superior Court, Case No.
 12 56-2021-00556158-CU-BT-VTA); expected trial length is 3 weeks.

- 13 b. Plaintiff’s trial counsel Charles Weir, along with trial counsel Andrew
 14 Beshai, are engaged in the following trial:

- 15 i. November 3, 2025: *Golden State Dermatology Associates, Inc. v.*
 16 *Amin Esfahani* (JAMS Arbitration, Case No. 5220008107); expected
 17 trial length is 1 week.

- 18 c. Defendant’s trial counsel David Lee is engaged in the following trials:

- 19 i. December 22, 2025: *Friant Water Authority, et al. v. Eastern Tule*
 20 *Groundwater Sustainability Agency* (Tulare County Superior Court,
 21 Case No. VCU306343); expected trial length is 3 weeks.
- 22 ii. April 13, 2026: *City of Alameda v. Greenway Golf Associates, Inc., et*
 23 *al.* (Alameda County Superior Court, Case No. 22CV011964);
 24 expected trial length is 2-4 weeks;

- 25 2. Accommodate witness schedules for multiple depositions, including depositions
 26 requiring cross-country travel; and

- 27 3. Provide additional time for the parties to resolve outstanding discovery issues,
 28 thereby reducing the need for judicial intervention.

To date, the Court has not continued the trial date in this case. Accordingly, the parties respectfully request that the Court extend the discovery deadlines as set forth below.

Event	Current Deadline	Proposed New Deadline
Fact Discovery Cut-off	October 31, 2025	March 9, 2026
Expert Disclosures	September 15, 2025	March 23, 2026
Expert Rebuttal	October 6, 2025	April 13, 2026
Expert Discovery Cut-off	October 31, 2025	May 4, 2026
Dispositive Motion Hearing Deadline	October 9, 2025	March 19, 2026
Trial	January 12, 2026	June 8, 2026

Dated: September 17, 2025

NOSSAMAN LLP
DAVID C. LEE
KASIA PENN

By: /s/ Kasia Penn
Kasia Penn

Attorneys for Defendant RTZ ASSOCIATES, INC.

Dated: September 17, 2025

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Andrew Beshai
Charles E. Weir
Andrew Beshai

Attorneys for Plaintiff INTUS CARE, INC.

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Andrew Beshai, attest under penalty of perjury that I have obtained concurrence and authorization from Kasia Penn, counsel for RTZ, to affix her signature to this filing.

Dated: September 17, 2025

MANATT, PHELPS & PHILLIPS, LLP
ANDREW BESHAI

By: /s/ Andrew Beshai
Andrew Beshai

[PROPOSED] ORDER

The Court, having reviewed and considered the Parties' Joint Stipulation to Continue the Trial and Pretrial Dates Deadlines, hereby ORDERS THAT:

1. Fact Discovery Cut-off
2. Expert Disclosures:
3. Expert Rebuttal:
4. Fact and Expert Discovery Cut-off:
5. Dispositive Motion Hearing Deadline:
6. Trial:

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated:

Hon. Jon. S. Tigar
United States District Judge